

Data entry

- Submitted 11/03/2025 2:42 PM ET by Anlan Zhang

New Submission Study Personnel

NEW CONTACT INSTRUCTIONS

December 2025 cycle.

Full Board HSC Project

11/05/2025 • Sussan Atifeh • Internal

Researchers from the American Institutes for Research have submitted this application to request approval for a project that is planned to help CDSS assess the effectiveness of California's dual language learners (DLL)identification efforts and evaluate professional development strategies aimed at improving child care quality for DLLs.

This study is a partnership between the American Institutes for Research (AIR) and the California Department of Social Services (CDSS), funded by a research grant from the Office of Planning, Research, and Evaluation (OPRE) within the Administration for Children and Families (ACF) in the U.S. Department of Health and Human Services.

The study will use administrative data from CDSS to map where DLLs are concentrated and identify gaps. A statewide survey will gather information from providers about professional development (PD) access and use

- Project Site:

American Institutes for Research (AIR)—A DSL from the American Institutes for Research is attached.

- Data-Source Department:

California Department of Social Services—LOS is not in CPHS format, a new LOS was requested.

[illegible]

- Funding:

Office of Planning, Research, and Evaluation (OPRE) which operates under the Administration for Children & Families (ACF)

- End product:

Research team plans to disseminate the findings from the study through briefs, webinars, conference presentations, and a research journal manuscript.

- Linkage:

No

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Dear Researchers: Please check all pages of the application (scroll down to see the entire page), address the comment(s), and resubmit the application. Thanks,

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If personnel are not found by their email address while trying to complete the following questions, you can add them in the system with the link below. Click on the "New Contact Form" and complete it. Within a few minutes of completing the form, you will receive an email notifying you of the availability of the new contact. You should then be able to add them in the subsequent questions.

User had the option to start a different form here.

PRINCIPAL INVESTIGATOR (PI)

Enter the Principal Investigator's email address.

Sami Kitmitto, PhD

Email: skitmitto@air.org

Business: (202) 403-5000

Choose the institution with which the PI is affiliated (not the location at which the research is being conducted).

American Institutes for Research

Enter the city in which the PI's institution is located.

Arlington

Enter the state in which the PI's institution is located.

Start typing in the state name to select the name from the list.

Virginia

Attach a copy of the PI's Curriculum Vitae.

Kitmitto, Sami - 2025 Resume - CA-CCPRP.pdf PI Curriculum Vitae

Deleted Attachments: 1 (Most Recent: Kitmitto, Sami - 2025 Resume.docx on 11/03/2025 1:35 PM ET)

CO-PRINCIPAL INVESTIGATOR (CO-PI)

Enter the Co-PI's email address by clicking on the "Add Contact" button.

If there are multiple co-principal investigators, repeat this action for all Co-PIs. If there are no Co-PIs for this project, skip this question.

No answer provided.

ADMINISTRATIVE CONTACT

Enter the email address(es) for the administrative contact(s). If you are the administrative contact, enter your email address, and enter anyone else you want listed as an administrative contact.

Shannon Keuter, MA

Email: skeuter@air.org

Business: (202) 403-5000

Colleen Boggs, BA

Email: cboggs@air.org

Business: (202) 403-5000

RESPONSIBLE OFFICIAL (RO)

Enter the RO's email address.

Please confirm in the "Study Procedures" section of this application that the listed RO has supervisory authority over the PI in the American Institutes for Research.

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*The RO **cannot** be the same person as the PI or Co-PI. The RO must have supervisory authority, in the administrative structure of the institution, over the PI.*

Karen Manship, MA Urban Affairs/Public Policy

Email: kmanship@air.org

Business: (650) 843-8198

OTHER RESEARCH STAFF

Enter the email address for any other research staff by clicking the "Add Contact" button.

Please ensure you have listed in this section "all" research staff who interact directly with participants (as in interviews or focus groups) or who will have access to the data.

This includes individuals who will have access to the linked de-identified data if that data file will contain any data fields that were originally in the state data.

This includes all research staff who are involved with data management, data processing or analysis and write-up, etc.

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Repeat this action for all other research staff not previously provided on this screen that should receive notifications about this project. If there are no additional research staff, skip this question.

Anlan Zhang

Email: azhang@air.org

Business: (202) 403-5000

Check for PI same as RO (internal only question) (Internal)

False

Project Information

SUBMITTER

Application completed by:

Anlan Zhang

Email: azhang@air.org

Business: (202) 403-5000

PREVIOUSLY APPROVED EXEMPTION

Is there a previously-approved exemption from CPHS for this project?

No

PROJECT TITLE

Enter the project title (please capitalize each word in your title).

Child Care Policy Research Partnerships – Professional Development as a Strategy for Improving Access to Quality Child Care for Young Dual Language Learners in California

PROJECT SITE

Indicate the primary site at which the research will be conducted.

American Institutes for Research

STUDY PROCEDURES

Indicate the study procedures involved in this research. Check all that apply.

Data Registry
Surveys

TYPE OF RESEARCH REQUEST

Indicate which of the following applies to this research. Check all that apply.

If for conducting this project, you have any contacts with human subjects, please select "Common Rule/Human Subjects."
Thanks.

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*Death Data Only refers to health-related studies requesting existing mortality data from **within** the California Human Health Services Agency (CHHSA)*

*SB-13 (Information Practices Act) refers to health-related studies requesting existing data from **outside** the CHHSA (e.g. California Department of Corrections and Rehabilitation [CDCR], California Department of Education [CDE], etc.) **OR** studies requesting data **within** the CHHSA that are not state funded or involving state staff.*

Common Rule/Human Subjects refers to health-related studies that involve direct or indirect interaction with human subjects (e.g. recruitment, interviews, etc.)

*Common Rule Only refers to health-related studies requesting existing data from **within** the CHHSA (e.g. Office of Statewide Health Planning and Development [OSHPD], California Department of Public Health [CDPH], etc)*

Common rule only

PROJECT TYPE DETAILS

Indicate which, if any, apply to this research. Check all that apply.

If you do not translate recruitment materials for conducting this study to other languages, please de-select "Non-English translation required" option in this section. If you plan to use translated documents to contact subjects, you can disregard this comment.

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If the research does not involve any of following, choose "None of the above."

Minimal Risk

Non-English translation required

Consent form

VULNERABLE POPULATIONS

Indicate which vulnerable populations, if any, will be involved with this research. Check all that apply.

If vulnerable populations are not part of the research, choose "Not applicable."

Note regarding minors: in the United States, a minor is under 18 years of age. If research is conducted outside the United States, a minor is under the age of majority in the countries where research is to be conducted.

Not applicable

FUNDING

Is this research funded?

Yes

Indicate the funding source for this project.

Federally funded

Enter name of federally-funded source.

Office of Planning, Research & Evaluation of the Administration for Children & Families

EXPEDITED REVIEW CONSIDERATION

Please check the criteria below that you think your project meets to qualify for an expedited review. If none of these expedited criteria are appropriate for your project, choose 'not applicable'; your protocol will be reviewed by the full committee. Note that CPHS will make the final determination of whether the project meets the criteria for expedited review.

In general, your response in this section should mirror your answer in the "Type of Research Request" section, however, if this study involves any contacts or interactions with human subjects (whether in person, or by mail, phone, text message, cellphone app, online survey, interview, focus groups, etc., or by a third-party working for you), it is not eligible for an expedited review (and should be scheduled to be discussed at the CPHS December 5, 2025, Full board meeting) and in this case you should select "Not applicable."
Thanks.

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Protected Health Information/Personally Identifiable Data (PHI/PID) is defined as information in any format that identifies the individual, including demographic information collected from an individual that can reasonably be used to identify the individual. Additionally, PHI is information created or received by a healthcare provider, health plan, employer, or health care clearinghouse; and relates to the past, present, or future physical or mental health or condition of an individual, including any of the 18 HIPAA identifiers.

Note: Please be aware that individual participants may be identifiable by combining other items in the data even when none of the 18 HIPAA identifiers are present. Thus, a study may still contain PID even after removing or never acquiring the identifiers, and the investigator may still need to provide complete answers for the data security questions in the protocol.

****The Departments within the California Health and Human Services Agency (CHHSA) are: Aging, Alcohol and Drug Programs, Child Support Services, Community Services and Development, Developmental Services, Emergency Medical Services Authority, Health Care Services, Mental Health, Public Health, Rehabilitation, Social Services and Statewide Health Planning and Development.**

New project requesting only previously existing PHI/PIDs and not involving state research staff, funding or state mental hospital patients from departments within the CHHSA (Common Rule review)

ANTICIPATED PROJECT START DATE

Projects cannot begin before they have been reviewed. The earliest possible start date is always the date of the next public meeting at which the project will be heard.

For a list of public meeting dates, see the CPHS website

12/05/2025

ANTICIPATED PROJECT END DATE

09/29/2029

Project Details

PURPOSE

Include a brief statement, less than 500 words, describing the research project. Be sure to address the background for the project, including relevant literature, the major research questions to be addressed, and the expected end product (e.g., article, report or other publications). Include the location(s) where the project will take place. The summary should be understandable to the general public.

Please name the main site of the study in this section.

• Note: The main site(s) of the study is/are the institution(s) responsible for the primary storage, receipt, management of study data, and accountable for ensuring data security and compliance with relevant regulations, including overseeing access controls, data encryption, and privacy safeguards—typically PI's institution, which is housing the servers through which the data is processed.

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The project is a partnership between the California Department of Social Services and the American Institutes for Research to examine professional development (PD) as a strategy for increasing access to quality child care for California's dual language learners (DLL).

California has invested heavily in strengthening child care for its growing DLL population, requiring systematic, asset-based identification and providing teachers with targeted professional development (California Master Plan for Early Learning and Care, Alcalá et al., 2020; AB 393, 2023). Research shows DLLs benefit from high-quality programs (Yazajian et al., 2015), yet they are less likely to enroll in them (Park et al., 2017; Karoly & Gonzalez, 2011). Programs report shortages of staff trained to support DLLs and engage families (Brodziak de los Reyes et al., 2020). Although teachers want to improve their practice, barriers such as time, cost, and limited awareness hinder PD participation (Warner-Richter et al., 2020). With advances in effective DLL strategies, tools to measure their classroom use are needed, as existing quality measures rarely assess DLL-specific practices (Castro et al., 2011; NASEM, 2017; Peisner-Feinberg et al., 2014).

The goals of the study are to:

1. Explore access to the child care system for DLLs, as the state implements new requirements for programs to identify DLLs.
2. Evaluate access to DLL PD and early learning resources to support DLL instruction.
3. Identify changes in instructional practice linked to participation in DLL PD.
4. Develop an observation tool that can be used to capture the quality of instruction for DLLs and inform quality improvement.

We will evaluate the distribution of DLLs across the child care system, using administrative data, to identify gaps and areas of high concentrations of DLLs. We will administer a statewide survey of providers to learn about access to and utilization of DLL PD, and highlight areas where there may be unmet need for PD. We will also examine the relationship between participation in DLL PD and the use of practices to support DLLs within programs using surveys and a classroom observation tool. This tool will also be refined for use in classrooms to inform practice and coaching for teachers of DLLs.

We will disseminate the findings from the study through briefs, webinars, conference presentations, and a research journal manuscript. This project will take place virtually, except for classroom observations.

MAJOR RESEARCH QUESTION

What is the major research question to be addressed in this project?

We have designed a four-component study with the following research questions to address each of the project objectives:

Research Question 1 (RQ1): What is the distribution of DLLs in the child care system?

Research Question 2 (RQ2): To what extent is there equitable access to DLL PD for providers across the state?

Research Question 3 (RQ3): To what extent does provider participation in DLL PD support stronger learning opportunities for DLLs?

Research Question 4 (RQ4): How can better data about learning environments and practices to support DLLs be gathered to foster quality improvement?

All these research questions were reviewed by AIR's IRB and received provisional approval.

Please note that AIR is requesting data from CDSS for RQ1 and RQ2 only. Therefore, our responses on this application only pertain to these two research questions.

STUDY PROCEDURES

Describe in detail all procedures for this research. Do not attach grant applications or similar documents. Information in this application must be sufficient to fully explain the procedures without such documents

Please confirm in this section that you use state data to contact with human subjects.

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Please ensure that all recruitment materials are included with your submission and attached to the appropriate sections of the application. This should include any flyers, emails, phone scripts, social media posts, or other outreach tools used to contact potential participants.

Thanks,

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Below are the study procedures for each of the research questions covered in this application:

DLL Identification Study (RQ1). First, we will draw on subsidy data obtained from CDSS through the 801A Monthly Child Care Population Report, which provides data on the “primary language” for each child in subsidized care. We will evaluate the quality of these data in collaboration with CDSS and determine an appropriate analytic approach. We anticipate using primary language, in conjunction with child age, contract type (CCTR, CMIG), provider type (center, FCCH), accreditation status (quality indicator), and provider zip code to conduct an analysis of the distribution of DLLs across state-contracted subsidized programs. Next, we will extend what we have learned about DLL distribution using the new DLL identification data collected as part of the implementation of AB 393. We will work with CDSS to obtain those data—specifically information about languages spoken at home, teacher language, and classroom language models in use for children in subsidized care. As this will be a new data source, there may be some data quality issues. We will work with CDSS to assess the quality of the data and adjust our analysis plan as appropriate. We plan on analyzing this data using the same approach as used for analyzing the 801A data.

PD Access Study (RQ2). A key activity of RQ2 in Phase 1 will be to better understand the landscape of the early learning and care programs supported by the federal and state subsidy funding streams, i.e., CDSS-contracted Title 5 child care programs—the “universe” for the study. We will review the CDSS subsidized child care contractor data to assess the completeness of the data and ensure that all fields that we need are included. We will collaborate with CDSS on this assessment. This effort will culminate, at the end of the planning year, in a comprehensive list of subsidized programs, including contact information for center directors and FCCH owners to whom the director survey will be sent.

We will develop an instrument (see draft version uploaded below) to survey all subsidized early learning and care programs in California. The survey instrument will focus mainly on the professional development experiences that teachers at the program have had in recent years, particularly the extent to which these PD experiences have addressed assets and learning needs of DLLs and strategies for supporting their learning. We will ask center directors and FCCH owners specifically whether their teachers already have participated in any of the DLL PD programs and whether there are any program-level policies and practices to support DLLs and to support teachers’ engagement in professional learning. In addition, the survey will request basic information about the program, such as the number of children and DLLs served, the number of children receiving subsidies, home languages of the DLLs, the number and type of classrooms, and the number and cultural and linguistic backgrounds of teachers. The survey will also be a main source of recruitment for the RQ3 study. The survey will be administered online. Data processing and analysis will occur after the survey concludes.

While the data we are requesting for RQ2 (list of small family child care homes) will not be used directly in RQ3 or RQ4, we will select/recruit the participating classrooms for RQ3 and RQ4 from those who responded to the RQ2 survey.

Please upload here any tables or charts related to your study procedures and any materials (such as surveys or interview questions) that will be presented to participants.

RQ1 Analysis Table shells.xlsx	Other Documents
RQ2 Survey Pilot_For Alchemer_Clean (QA review).docx	Questionnaires

RECORDING

Will audio or video recording occur?

No

DECEPTION

Will deception be used in this study?

No

CALIFORNIA HEALTH AND HUMAN SERVICES AGENCY (CHHSA) DEPARTMENTS LIST

Indicate any of the following CHHSA department(s)' involvement in providing research staff, funding and/or patients from State mental hospitals for this project.

Not applicable

STATE DEPARTMENT DATA/SPECIMENS

Choose the department(s) from which you are requesting data and/or specimens and provide the formal name of the database or specimen registry. After you have selected the department from the drop down and entered the formal name of the database or specimen registry, click 'add' and repeat to add additional data and/or specimens if applicable.

Agency	Provide the formal name of the data base or specimen registry.
California Department of Social Services	Child Development Management Information System (CDMIS)
California Department of Social Services	Childcare Licensing Data Base

Study Population

POPULATION DESCRIPTION

Provide a full description of how human subjects will be involved in the research. Address characteristics of subjects such as: age; sex; ethnicity; and number of participants. Include requested participant number.

RQ1: We will use administrative data collected by CDSS for this component of the project. There is no direct interaction with human subjects. The data will include all children who received subsidized child care in several specified months and provide information on child, family, and program characteristics. The data requested will include all children regardless of age, sex, or race/ethnicity. Based on aggregate counts shared with us we anticipate that a monthly data extract will include about 300,000 children.

RQ2: We will administer a survey online to all directors of child care centers and owners of family child care homes in California who provided subsidized services through one of CDSS's programs. All outreach and recruitment activities will be conducted via email or mail. Human subjects will be involved to the extent that the center director or FCCH owner chooses to respond to the survey. Participation in the survey in whole or in part is voluntary. No questions on the surveys will be mandatory. We will administer the survey to all CDSS-contracted Title 5 child care programs. Based on aggregate counts shared with us, we anticipate that the survey invitation will be sent to approximately 2,600 programs, about 600 of which will be small FCCHs.

DATABASE DETAILS

List the database(s) to be used and the time period(s) being requested. This may include requests for future data that is not available at this time.

*List the variables being requested, including a brief description of each variable.
Justify the need for each variable and for the quantity of data being requested.
You may also attach a list of variables on the next question.*

Also address if participants will be involved in any other studies.

For RQ1, we anticipate seeking the following administrative data collected and retained by CDSS:

- (i) Child-level data from the 801A Monthly Child Care Population Report
- (ii) Child-level data, henceforth referred to as 'DLL Data', collected as part of the implementation of California Assembly Bill 393, Reg. Sess. (2023) ch.435 (Wel.& Inst. Code §10209.6)

For the 801A data (i), AIR requests data for two points in time: 1) the most recent month with available data when the data sharing agreement with CDSS takes effect and 2) that same month one year prior. If 801A data are still being collected after the implementation of California Assembly Bill 393, Reg. Sess. (2023) ch.435 (Wel.& Inst. Code §10209.6) (henceforth referred to as 'the law'), AIR will request a third month of 801A data that would be concurrent to (e.g., the same month or months as) the DLL Data delivered to them.

For the DLL data (ii), AIR anticipates requesting data for one point in time (e.g., one month, in one year). Because the DLL Data collection and reporting for the law have yet to be implemented and finalized, AIR and CDSS will discuss the timing and specifications for the request of the DLL Data after the data becomes available.

For both 801A (i) and DLL data (ii), we request child-level data, including information on the "primary language" for each child in subsidized care, along with other child, family, and provider characteristics. Data elements that AIR anticipates requesting are included in the attached variable list. We will use the 801A and DLL data to conduct analysis of the distribution of DLLs across state-contracted subsidized child care programs (RQ1). The 801A data will also serve as baseline data for reviewing the DLL Data in the future. These data will not be reused for other studies.

For RQ2, we anticipate seeking the following administrative data collected and retained by CDSS that we will use to administer the survey:

Program contact data for child care providers including both Centers and Family Child Care Homes (FCCHs)

A comprehensive list of subsidized programs, including contact information for center directors or FCCH owners, is necessary for us to administer the survey. Some contact information for Small FCCHs is considered confidential information. Data elements that AIR anticipates requesting are included in the attached list. These data will not be reused for other studies. We will collect this contact information once for all small FCCHs in operation at the time this application is approved and the agreement with CDSS is finalized.

Please see the attachment below for the list of variables being requested for both RQ1 and RQ2.

If you have a list of variables with the details requested in the above question, attach that here. If you provided all details on the database in the question above, skip this question.

Proposed Variable List.docx List of Variables

RATIONALE

What is the rationale for studying the requested group(s) of participants?

Dual Language Learners are a key priority group for California, and developing an understanding of the presence and distribution of this population is critical for informing child care policy in the state. Improving services and supports for DLLs must first begin with understanding how many there are, where they are, and what their language backgrounds and needs are. The process of DLL identification in California also can serve as a model for other states that do not have a systematic approach for identifying their DLLs; with only a handful of states with identification systems in place, this is a significant need. A deeper understanding of the distribution of DLLs across the state will support CDSS's evaluation of funding allocations for supports for DLLs and educator capacity-building investments in state contracted programs more broadly.

Subsidized Child Care Centers and Homes are an important resource for DLLs to receive child care services as they tend to come from lower-income households than monolingual children; DLLs also benefit more from attending high-quality programs than their monolingual peers. To provide quality care to these children, teachers of DLLs need PD designed specifically to support DLL instruction. Information about real access and utilization of DLL PD by teachers across the state will inform decisions about modifying PD approaches (such as timing, mode, and language offerings), targeting resources to needed areas, and incentivizing program staff to participate. The examination of how teacher practices are related to participation in DLL PD also will inform CDSS decisions about additional approaches or supports that might be necessary to ensure child care providers have what they need to offer the best learning opportunities for DLLs. Improving the system as a whole depends on ensuring access to learning opportunities for all teachers and providers. Therefore, it is important to understand access to professional development for educators in different types of child care programs, including small family child care homes.

STUDY DURATION

Estimate the probable duration of the entire study. This estimate should include the total time each subject is to be involved and the duration of each data collection about the subject.

E.G., This is a two-year study. Participants will be interviewed three times per year; each interview will last approximately two hours. Total approximate time commitment for participants is 12 hours.

This is a five-year study. The duration of each data collection varies by research question.

For RQ1, we will request administrative data from two data sources from CDSS—801A child-level data and AB 393 child-level DLL data. There is no direct involvement by human subjects.

For RQ2, we will use the contact information for directors of child care centers and owners of family child care homes to invite them to participate in an online survey. The survey will last approximately 30 minutes. Participation in the survey and all items on the survey are voluntary. We will conduct the survey once over the course of the study. We will begin administration of the survey once we received all of the contact information from CDSS.

Risks and Benefits

RISK DESCRIPTION

Provide a description of possible risks to participants: physical, psychological, social, economic, loss of data security, and/or loss of confidentiality. Describe and justify whether the research is minimal risk or greater than minimal risk.

While the possible risks to participants vary by research question (see below for more details), overall the proposed research poses minimal risks to the participants.

For RQ1, the research uses existing administrative data collected by CDSS. However, CDSS will de-identify the data and remove all personally identifiable information prior to sharing the data with AIR. Risk from re-identification of individuals is negligible because there does not exist public records from which children or families could be re-identified. Additionally, should the data be disclosed and individuals re-identified, the nature of the data being requested carries low risk of harm. Although the requested data carry minimal risk of disclosure and low risk of harm, AIR will treat the data as we would any sensitive data and follow corresponding protocols to maintain the security of the data. Additionally, we will report aggregated results only.

For RQ2, we are requesting information such as director/owner name and site address, which constitutes personally identifiable information, especially for small FCCHs. The risk is that these data may be disclosed. However, the contact information for small FCCHs, though not available in one compiled data file, is publicly available on the Internet (e.g., on this website <https://mychildcareplan.org/>). The additional risk to the owners of small FCCHs associated with any data disclosure is minimal, and AIR will follow strict protocols to maintain the security of the data.

The survey asks factual questions about access to DLL PD and DLL instruction at the care setting and does not ask about any sensitive topics. Hence, there is minimal risk of harm to center directors and FCCH owners from participating in the survey. The survey responses will be linkable to individual centers and FCCHs but not to any specific staff member who provides care nor any child receiving care. The risk to the survey participants (center directors and FCCH owners) is that their responses may be disclosed. However, because the responses will not contain sensitive information the risk of harm should there be a disclosure is minimal.

Although the requested data and data collected via surveys carry low risk of disclosure and harm, AIR will treat the data as we would any sensitive data and follow corresponding protocols to maintain the security of the data. Additionally, we will report aggregated results only.

INTERNATIONAL RESEARCH

Will this research occur outside of the United States or U.S. territories?

Check with client to see if they consider territories to be outside the U.S. or not, as this can vary between institutions.

No

BENEFITS

Describe the benefits, if any, to the subjects or to society that will be realized as a result of this project. Discuss the benefits that may accrue directly to the subjects as well as to society. If there is no direct benefit anticipated for the subjects, state that clearly.

For RQ1, there are no direct benefits to individuals from this study. Indirectly, the study is intended to help the state of California and child care providers better educate Dual Language Learners, so participation will contribute to improving the care of DLL children in child care settings.

RQ2. There are no direct benefits to center directors and FCCH owners for participation in the study. Indirectly, the study is intended to help the state of California and child care providers better educate Dual Language Learners, so participation will contribute to improving state policy and supports for providers for their provision of quality child care of DLL children.

Additional explanation of the indirect benefits of this study to individuals utilizing child care and California child care directors and owners is presented below:

CA's Master Plan for Early Learning and Care calls for (1) proactively identifying and reporting children's language status; (2) requiring specialized training and development to address dual-language learner development; (3) updating early learning guidelines to include DLLs; (4) collecting and using data to support DLLs; and (5) guaranteeing equitable access to learning and care for all. AB393 was designed to address the Master Plan's directive for better identification of DLLs.

Our project supports CDSS in the implementation of CA's Master Plan for Early Learning and Care and AB393. In our first task, our analysis of the 801A data and DLL data collected in response to AB393 will help CDSS in its ongoing rollout of the data collection under AB393 by gauging the improvements, and challenges, to DLL identification under the new system. The other tasks on our project supports CDSS's implementation of the Master Plan by developing tools for measuring the quality of care for DLLs and gauging the effectiveness of different DLL-focused trainings for providers. The program director survey, for which we will need FCCHs' contact information to administer, is an early step in our plans for developing the tools. Through the survey will collect information about the current use of training and development for providers.

New knowledge from this project has the potential to influence program and policy decisions beyond California as well as future research directions. Lessons learned about assessing access from this work can serve as a model for other states to develop policies regarding the identification of DLLs in their child care systems and to assess access to appropriate PD opportunities for their teachers. In addition, the refined COLES-DLL can be used more broadly in policy and research. As states rethink the cultural and linguistic responsiveness of their quality improvement systems, the tool can be considered for inclusion as a supplement or refinement to their quality indicators to better capture quality for DLLs. The tool also can be used in research to evaluate classroom and instructional quality for DLLs and to evaluate interventions to support instruction. Further, the tool may be able to be used by center directors and FCCH owners in their programs to measure teacher practice in supporting DLLs.

Administrative Safeguards

PERSONALLY IDENTIFIABLE DATA (PID) INSTRUCTIONS

Protected Health Information/Personally Identifiable Data (PHI/PID) is defined as information in any format that identifies the individual, including demographic information collected from an individual that can reasonably be used to identify the individual. Additionally, PHI is information created or received by a healthcare provider, health plan, employer, or health care clearinghouse; and relates to the past, present, or future physical or mental health or condition of an individual, including any of the 18 HIPAA identifiers.

Note: Please be aware that individual participants may be identifiable by combining other items in the data even when none of the 18 HIPAA identifiers are present. Thus, a study may still contain PID even after removing or never acquiring the identifiers, and the investigator may still need to provide complete answers for the data security questions in the protocol.

If the researcher demonstrates that he or she is unable to comply with any of the requirements below, he or she may request an exception from these requirements. The researcher should indicate any measures that will be taken to address this requirement. The exception request should be made in the text box of the corresponding requirement. An exception will only be granted if the researcher can demonstrate that adequate alternative measures have been taken to minimize risks so as to justify the exception.

HIPAA IDENTIFIERS

Please identify which HIPAA Identifiers you plan to request as part of your submission.

Name

Address (all geographic subdivisions smaller than state, including street address, city county, and zip code)

Telephone numbers

Email address

Certificate or license number

TRAINING PROCEDURES

Describe the procedures for training all research staff who have access to PID on privacy and security. Indicate if staff are required to sign a confidentiality statement related to general use, security, and privacy.

All AIR staff are required to complete data privacy and security trainings, including training on HIPPA compliance, data security, and protection of human subjects in research. Additionally, staff who work on projects requiring IRB oversight must have valid training records through Collaborative Institutional Training (CITI). Staff working on this study are not required to sign a confidentiality agreement.

STAFF VETTING PROCEDURES

Describe procedures, either background check or thorough reference check, for vetting staff who will have access to PID.

As a condition of employment, all AIR employees must successfully complete criminal background checks, employment verification, and, where applicable, educational background checks, and employment background checks. These procedures are managed by AIR Human Resources and AIR generally uses a third party agency to conduct the background checks. The type of information that can be collected by this agency includes, but is not limited to, that pertaining to an individual's past employment, education, criminal record, and credit history when applicable. No additional background checks or reference checks are conducted for staff supporting this study.

SUPPORT LETTER

Obtain and submit a department support/data release letter.

Please obtain and attach a Support Letter from CDSS following the format specified on CPHS website. Applications without a Support Letter cannot be assigned to the CPHS committee members and will be returned back to you.

Please note that a "Support Letter" is NOT an Approval Letter. Rather, it is a statement that certifies that a "preliminary" or "initial" review has been conducted by the data-source department, ensuring that the release of data will comply with all applicable state and federal statutes.

For your convenience, you can access the acceptable template for a support letter using the links below:

<https://www.cdii.ca.gov/wp-content/uploads/2024/10/Departmental-Support-Letter-Template-Revised-on-October-8th-2024.pdf>

- Please do not delete the document you already attached in this section.

Thank you!

11/04/2025 • Sussan Atifeh • Not Internal

This is a statement from the state agency or department you are receiving data from. It must be on that agency's/department's letterhead and should include both

1) that the release of the desired data is legal and

2) that the entity is willing to release the desired data to you, the researcher. If you are not receiving data, this letter should indicate that you are supported.

****For VSAC requests, if you do not have a Departmental Letter of Support (LOS)/Data Release, you may upload a copy of the Data Request Form (application) from the department to secure a review for the upcoming cycle. The protocol will not be approved until the LOS is uploaded to the protocol.**

Please also review the CPHS Statement for Birth and Death Data.

CDSS Support Letter.pdf Department Letter of Support

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PREVENTING RE-USE AND UNAUTHORIZED ACCESS

Explain how you will ensure that data will not be reused or provided to any unauthorized person or entity.

Unauthorized means that the person or entity does not have a need to access the data for purposes of the research project approved by CPHS.

AIR's data sharing agreements (including AIR's data-sharing MOU with CDSS) strictly prohibit the reuse or disclosure of confidential data to any unauthorized person or entity. Data access is limited to designated project personnel, and all use is restricted to the purposes outlined in the MOU between AIR and CDSS. Staff access to data will be granted on an as-needed basis and will be regularly monitored. In addition, within 60 days of project completion or termination of the MOU, AIR will delete or destroy any PID received from CDSS.

AIR enforces strict data governance protocols, and data use on all projects is governed by AIR's Information Security Policy, which prohibits reuse or disclosure of data outside approved project scopes. All data handling follows federal standards including FERPA, HIPAA, and FISMA.

CONFIDENTIALITY OF PUBLISHED DATA

Indicate whether information will be published that could possibly be used to identify an individual subject.

AIR will not disclose any data in a way that will personally identify any individual person or child care program/provider. AIR will report the results of analysis conducted in this study only in aggregate.

DATA REQUEST JUSTIFICATION

Provide adequate justifications for the quantity of the data, the years and the variables being requested. Have you requested no more than the minimum necessary data to perform the research?

Yes, we are requesting no more than the minimum necessary data needed to perform this research.

For the 801A data, which is collected monthly, AIR is requesting data from 2 different months, separated by a year, in order to accurately assess the distribution of DLLs. Over the past two years, guidelines and practices related to the reporting of children's home language in 801A data have evolved, so analyzing data from two time points will provide a more comprehensive picture of DLL distribution. We are requesting the desired variables from the 801A data to gain an understanding of the size and distribution of the DLL population across various child, family, and provider characteristics. Because child, family, and provider names are not needed CDSS will create de-identified data to provide to us instead so that we can count distinct units in our analysis. We also may request a third month of 801A data that corresponds to the same month that we are requesting DLL data (AB 393 data) so that we may compare the two data sources.

For the DLL data collected under implementation of AB 393, we expect to request only one month's worth of data, which is the minimum amount of data necessary to complete our analysis. We are requesting the desired variables from the AB 393 data to update the previously conducted analysis with more accurate DLL identification and to understand the size and distribution of the DLL population across additional child, family, and provider characteristics (such as languages spoken at home, teacher language, and classroom language models in use for children in subsidized care).

For RQ2, the program director/owner contact information data are necessary because we need a comprehensive list of subsidized programs to whom we will administer the survey. We only need a point-in-time snapshot of the information, which is the minimum amount of data necessary for this task.

Please see the previously attached variable list for the detailed justification for each variable being requested.

LIMITATIONS TO DATA ACCESS

Indicate if access to data is limited only to those with a need to know for purposes of implementing or evaluating the research.

Yes, access to data is limited only to those with a need to know for purposes of implementing the study.

PROTECTION AGAINST SMALL CELL SIZES AND ASSOCIATED PROBLEMS

Describe appropriate and sufficient methods to protect the identity of individual subjects when small cells or small numbers and/or data linkage to another data set are involved in the research project.

To comply with California Health & Human Services Agency (CalHHS) Data Deidentification Guidelines (DDG), researchers must ensure that no cell size smaller than 11 is reported to prevent potential re-identification of individuals.
Please describe your de-identification methodology, including:

- How small cell sizes are suppressed and whether the CalHHS DDG standard (minimum cell size of 11) is being followed.
- Any additional suppression techniques used beyond the standard guidelines.

Providing a detailed explanation will help reviewers verify compliance with privacy and data protection standards.

11/04/2025 • Sussan Atifeh • Not Internal

AIR will not disclose any data in a way that will personally identify any individual person or child care program/provider. AIR will report the results of the study only in aggregate. We will report the results only for cell sizes that are greater than ten, i.e., we will suppress any statistic where the underlying population or sample is less than or equal to 10.

Our study does not require linking the requested data to another data set.

LINKAGES

Will the data set be linked with any other data sets?

No

DESTRUCTION OF PID VERIFICATION

Indicate that you will provide CPHS with a letter certifying that PID has been destroyed and/or returned to the data source once research is concluded.

Yes

DATA SECURITY LETTER

Upload a certification/statement from the Chief Information Officer, Privacy Officer, Security Officer or equivalent position of the researcher's institution that CPHS Data Security Standards are met.

- Data security letters cannot be signed by the Principal Investigator or Responsible Official.
- The data security letter must be on your institution's letterhead.
- Example of data security letter

StateIRB_DataSecurityRequirementLetter_CALIFORNIA CHILD CARE
POL_10142025_signed.pdf

Data Security
Letter

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Physical Safeguards

DATA PROTECTION

Indicate that research records and physical samples will be protected through the use of locked cabinets and locked rooms; PID in paper form will not be left unattended unless locked in a file cabinet, file room, desk, or office.

Yes

DATA DESTRUCTION

Will data/samples will be destroyed or returned as soon as it is no longer needed for the research project.

Yes

RETAINED DATA

Will the retained data/samples have personal identifiers or be de-identified?

data will contain personal identifiers

DESTRUCTION METHODS

Describe how you will ensure the PID in paper form is disposed of through confidential means, such as cross cut shredding or pulverizing.

Not applicable. The research will not involve PID in paper form.

FAXING

Describe how you will ensure that faxes with PID are not left unattended and fax machines are in secure areas.

Not applicable. The research will not involve faxing.

MAILING

Indicate whether mailings of PID are sealed and secured from inappropriate viewing; and whether mailings of 500 or more individually identifiable records of PID in a single package, and all mailings of PID to vendors/contractors/co-researchers, are sent using a tracked mailing method, which includes verification of delivery and receipt, such as UPS, U.S. Express Mail, or Federal Express, or by bonded courier.

Not applicable. The research will not involve mailings of PID.

ELECTRONIC STORAGE

State whether PID in paper or electronic form, e.g., stored on laptop computers and portable electronic storage media (e.g., USB drives and CDs), will ever be left unattended in cars or other unsecured locations.

Not applicable. We will not store PID in paper or on laptop computers or portable electronic storage media.

PHYSICAL STORAGE

Describe whether facilities, which store PID in paper or electronic form, have controlled access procedures, and 24 hour guard or monitored alarm service.

AIR facilities storing PID employ controlled access procedures, including badge access, visitor logs, and locked containers for physical documents. Electronic data is stored in secure, access-controlled environments such as the Secure Project Portal (SPP) and FedRAMP-certified Azure cloud. Data centers and server rooms are monitored by video surveillance and require authorized access. While 24-hour guard service is not universal, all facilities have monitored alarm systems and multiple layers of electronic and physical security, including swipe badge access. AIR Data Owners and system managers within Information Technology coordinate with Workplace Management and the Information Security Office to ensure the protection of AIR information technology resources (e.g., installations, personnel, equipment, systems, electronic media, documents, etc.) from damage due to malicious activities, loss, theft, or unauthorized physical access.

For this study, child-level 801A data and DLL Data will be stored in AIR's SPP, which is hosted on Microsoft's FedRAMP-certified Azure cloud, and provides a controlled environment and approved analytical tools. All data in the SPP is encrypted at rest using US Government-standard FIPS 140-2 compliant encryption. Access requires multi-factor authentication (MFA) and authorization is granted based on domain policy and group permissions. Data in transit is encrypted using US Government-approved TLS for encryption and server authentication. The SPP enforces strict access, encryption, auditing, and monitoring in line with NIST 800-53, NIST 800-171, and CIS Controls, and meets HIPAA standards for ePHI. The SPP network employs next-gen firewalls, malware mitigation, multi-factor authentication, and TLS encryption. The AIR SPP was designed to store sensitive data and PII with strict access, auditing, data and transport encryption, and event monitoring.

Program contact data for child care providers for RQ2, including those for small FCCHs, will be stored in Airtable. Airtable is a secure data management tool that can be used to store and manage records. Airtable is a cloud-based system with secure authentication integrated with AIR's identity and access management system that requires multi-factor authentication. Airtable has obtained International Organization for Standardization (ISO) 27001, ISO 27701, and Texas Risk and Authorization Management Program Level 2 certification and has also maintained System and Organization Controls 2 Type II reports. Additionally, Airtable is committed to adhering to privacy laws, regulations, and best practices, such as General Data Protection Regulation and California Consumer Privacy Act.

SERVER SECURITY

Provide a description of whether all servers containing unencrypted PID are housed in a secure room with controlled access procedures.

Data centers and server rooms are monitored by video surveillance and require authorized access. All servers, firewalls, and other elements of key infrastructure have system security, auditing and major application logs forwarded to a secure central storage area that is monitored by Security Information and Event Management (SIEM) system. The SIEM system is configured in a way that provides prompt alerting and reporting of computer intrusion and misuse.

STORING IDENTIFIERS

Indicate whether identifiers will be stored separately from analysis data.

Identifiers (e.g., provider name and address) will be stored together with other requested data, in the same location and using the same procedure that meets the requirements for PID. Secondary analysis data that have been aggregated to remove disclosure risks may be stored separately from the data that contain identifiers for easier access by project staff.

DISK STORAGE

State whether all disks with PID will be destroyed.

We will not store the study data on disks such as hard drives or floppy disks. All files in the SPP can be securely destroyed by destroying the encryption key used to encrypt files via Vormetric.

Electronic Safeguard

COMPUTER ACCESS OVERVIEW

State whether all computer access will be protected through the use of encryption, passwords, and other protections.

All AIR-managed computers accessing PID are protected by strong passwords, multi-factor authentication (MFA), and automatic screen lockouts. Passwords must meet complexity standards and are subject to expiration policies. Remote access requires MFA and is monitored for inactivity. Unauthorized backup services are prohibited.

FIPS 140-2 COMPLIANCE: WORKSTATIONS

Indicate whether all workstations that contain PID have full disc encryption that uses FIPS 140-2 compliant software. If not, explain why not and what encryption will be used.

Not applicable. We will not store PID on workstations.

FIPS 140-2 COMPLIANCE: LAPTOPS

Indicate if all laptops that contain PID have full disc encryption that uses FIPS 140-2 compliant software. If not, explain why not and what encryption will be used.

Not applicable. We will not store PID on laptops.

FIPS 140-2 COMPLIANCE: REMOVABLE MEDIA DEVICES

Indicate if PID on removable media devices (e.g. USB thumb drives, CD/DVD, smartphones, backup recordings) are encrypted with software that is FIPS 140-2 compliant.

Not applicable, we will not store PID on removable media devices.

SECURITY PATCHES

Indicate if all workstations, laptops and other systems that process and/or store PID have security patches applied in a reasonable time frame.

AIR performs weekly vulnerability scans and applies security patches promptly based on severity. Systems storing sensitive data are scanned with privileged credentials to ensure full coverage. Findings are tracked and remediated using ticketing systems. Patch management is integrated into AIR's configuration lifecycle process.

PASSWORD CONTROLS

Indicate if sufficiently strong password controls are in place to protect PID stored on workstations, laptops, servers, and removable media.

AIR enforces strong password controls for all systems handling PID. Passwords must be at least 12 characters, use a mix of character types, and are changed at least every 90 days. Account lockout policies are in place to prevent brute-force attacks. MFA is required for remote access and for accessing systems that store sensitive data.

ELECTRONIC SECURITY CONTROLS

Indicate if sufficient system security controls are in place for automatic screen timeout, automated audit trails, intrusion detection, anti-virus, and periodic system security/log reviews.

AIR systems include automatic screen timeouts, audit trails, intrusion detection systems (IDS), antivirus protection, and centralized log monitoring via a Security Information and Event Management (SIEM) system. Logs are retained for at least 90 days and support forensic investigations. Anti-malware tools are updated automatically and managed centrally.

FIPS 140-2 COMPLIANCE: ELECTRONIC TRANSMISSION

Explain whether all transmissions of electronic PID outside the secure internal network (e.g., emails, website access, and file transfer) are encrypted using software which is compliant with FIPS 140-2.

The proposed study does not require transmissions of electronic PID from AIR to any outside party. For transmissions of electronic PID from CDSS to AIR, the data will be transferred using AIR's provisioned Azure Cloud-hosted SharePoint Online, which utilizes FIPS 140-2 compliant encryption that are authorized to store and transfer Personally Identifiable Information (PII) that is classified up to "Confidential." No PID will be transmitted via other transfer methods such as email.

Files will be removed from transfer storage (i.e., SharePoint Online) promptly when no longer needed for transfer purposes.

INTERNET ACCESSIBILITY

Note if PID in an electronic form will be accessible to the internet.

PID stored electronically is not accessible via the public internet. It is housed in secure environments such as AIR's SPP, which enforces strict access controls, encryption, and monitoring.

DISPOSING OF PID

When disposing of electronic PID, indicate whether sufficiently secure wiping, degaussing, or physical destruction will be used.

Within 60 days after termination of the MOU with CDSS, AIR will delete and destroy any data received. If requested by CDSS, a certificate of data destruction may be prepared by AIR. All data will be destroyed in accord with AIR data governance policy.

Conflict of Interest Information

CONFLICT OF INTEREST (COI) INSTRUCTIONS

A COI is defined as any financial or other relationships of the researcher(s) or the institution that could be perceived as affecting the objective conduct of the research, including the interpretation and publication of the findings. Researchers must disclose any COI, including perceived COI.

Financial relationships to be disclosed include but are not limited to the following:

- Present or anticipated ownership of stock, stock options, or other financial obligations of the source of funding.
- Receipt or expectation of payment of any sort in connection with papers, symposia, consulting, editing, etc. from the source of funding.
- The sale or licensing or anticipated sale or licensing of medical or other products or intellectual property, such as patents, copyrights, or trade secrets to the source of funding or other entities.
- Any past, present or anticipated receipt of money or other valuable consideration from the source of research funding by the researcher(s), the family of the researcher(s), the research institution, or by an institution in which the researcher(s) or the family of the researcher(s) has an interest as owner, creditor, or officer.

DISCLOSURES

Does any member of the study team, members' spouses, or members' dependent children have any significant financial interests related to the work to be conducted as part of the above-referenced project?

No

HIPAA Determination

HIPAA INSTRUCTIONS

To determine if this project is covered by HIPAA, answer the following questions.

COVERED ENTITY

Will health information be obtained from a covered entity, known as a clearinghouse, such as Blue Cross, that processes or facilitates processing health data from another entity, including but not limited to state databases?

No

HEALTHCARE PROVISIONS

Will the study involve the provision of healthcare by a covered entity, such as the UCD Medical Center?

No

OTHER HIPAA CRITERIA

Will the study involve other HIPAA criteria not listed above?

No

Cover Letter and PI Signature for PI Submission

BUDGET

Does this project have a budget?

Yes

Attach a copy of your project budget here

Budget_California Child Care Policy Research Partnership.docx Project Budget

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COVER LETTER

Attach a copy of your project cover letter.

Cover letter must have the requesting institution's letterhead.

Cover Letter_California Child Care Policy Research Partnership.docx Cover Letter

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In order for the PI to review and sign this form, you will need to click "Next" and on the next page, click "Submit." At that point the PI will receive notification that will need to review the application and if they request changes, they will return the form to you and you will receive an email notification.

Calculated Field for agency plus data set *(Internal)*

California Department of Social Services: Child Development Management Information System (CDMIS)
California Department of Social Services: Childcare Licensing Data Base

PI Signature for Coordinator Submission (Initial)
- Submitted 11/04/2025 3:27 PM ET by Sami Kitmitto, PhD

PI Review

Please click "Next" and "Submit" in order to submit this application, regardless of whether or not it is ready for review. If you indicated it is ready for review, it will go to the Responsible Official for review and signature, and if not, it will be returned to the individual who completed the form for changes.

Is this application ready to be reviewed by the IRB? If not, choose no to have the application sent back to the coordinator for revisions.

Yes

To sign this form, enter your IRBManager password. By signing this form, you are indicating that the information within this application is accurate and reflects the proposed research and that you attest to the conflict of interest disclosures for all study team members.

Signed Tuesday, November 4, 2025 3:26:22 PM ET by Sami Kitmitto, PhD

Responsible Official Signature

- Submitted 11/04/2025 4:41 PM ET by Karen Manship, MA Urban Affairs/Public Policy

Responsible Official Signature

After reviewing this application, is it ready for submission to the CPHS IRB?

Yes, ready for submission to IRB.

Enter your password to sign this protocol. By signing this protocol, you are attesting that the information within is accurate and reflects the details of the proposed research project.

Signed Tuesday, November 4, 2025 4:41:03 PM ET by Karen Manship, MA Urban Affairs/Public Policy

After choosing whether or not the submission is ready for CPHS IRB review, please click "next" and "submit" (on the next screen) to move the form forward to the CPHS IRB or back to the Researcher.

Notify IRB for Pre-Screening

Internal IRB Screening

CPHS Office: The questions on this page will appear every time the project is resubmitted to the CPHS IRB (even after review). Once the project has been reviewed by a committee member, unless researcher has changed questions on the form that impact the level of review, you do not need to update the questions here. If the changes made are not clear and require additional clarification change the 'ready for review' to 'no' and require changes. When you change the answer back to yes, it will remember your previous answers.

Is this study ready to be reviewed by the CPHS panel?

No

On the previous page please enter notes for the research team on what additional information is needed if you haven't already.

Summarize the revisions and/or additional information the PI needs to provide in order for this study to be reviewed by CPHS IRB?

Dear Researchers: Please check all pages of the application in IRBManager (scroll down to see the entire page), address the comment(s), and resubmit the application. Thanks,

This is the current date (used to calculate the revisions due date; no action is needed on this date)
11/05/2025

Revisions Deadline (default to 3 business days, change if necessary for holidays)
11/10/2025

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2025.10.8265.0/Release/3375223 | GCWBWS1 | 2025-11-05 18:13:52Z

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